March 4, 2004

Mr. Lew W. Myers Chief Operating Officer FirstEnergy Nuclear Operating Company Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION RE: ROOT CAUSE ANALYSIS

(TAC NO. MC1642)

Dear Mr. Myers:

Recently, concerns were raised regarding the Davis-Besse root cause analysis which FirstEnergy Nuclear Operating Company submitted to the NRC concerning the reactor pressure vessel head degradation. To resolve the concerns, the NRC staff will need additional information. Enclosed is a request for additional information

The enclosed questions were provided to your staff on February 25, 2004, and the questions were discussed with members of your staff on that date. It is our understanding that FirstEnergy Nuclear Operating Company will respond to the questions by May 25, 2005. If our understanding is not correct, please contact me at (301) 415-3027 at the earliest opportunity.

Sincerely,

/RA/

Jon B. Hopkins, Sr. Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request for Additional Information

cc w/enclosure: See next page

Davis-Besse Nuclear Power Station, Unit 1

CC:

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The Honorable Dennis J. Kucinich, Member United States House of Representatives 14400 Detroit Avenue Lakewood. OH 44107

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Paul Gunter Director Nuclear Watchdog Project Nuclear Information & Resource Service 1424 16th Street NW Suite 401 Washington, DC 20009 Mr. Lew W. Myers Chief Operating Officer FirstEnergy Nuclear Operating Company Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, OH 43449-9760

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REQUEST FOR ADDITIONAL INFORMATION

DAVIS-BESSE NUCLEAR POWER STATION

ROOT CAUSE ANALYSIS

TAC NO. MC1642

1. The purpose of the vent line that runs from nozzle14 to the steam generator number 2 upper primary hand hole is to vent non-condensible gases from the Davis Besse reactor pressure vessel (RPV) head during a loss of coolant accident. The head vent configuration at Davis Besse is unique from other Babcock and Wilcox (B&W) designs in that reactor coolant flows continuously through it during power operations. Given the proximity of the cracked nozzles in the old RPV head to the vent line nozzle, a phenomenon may exist wherein the continuous flow through the vent line impacts the potential for cracking of nearby nozzles. This same phenomenon, if real, could impact the cracking assumptions for the new RPV head.

Confirm whether or not you considered this potential phenomenon in the April 2002 root cause analysis that was performed as a result of the degradation of the old RPV head. If an evaluation was performed, provide the results of the technical analysis that would demonstrate that the phenomenon either did or did not impact cracking in adjacent nozzles. If this potential phenomenon was not considered, provide the technical basis for discounting it. If it was not discounted, but it was never considered, provide a technical basis for why it will or will not play a role in the operation of the new RPV head. If your analysis results show that there is a potential impact on the new RPV head penetrations, discuss the actions that would be taken to ensure the integrity of the head penetrations. Consider whether an update to your root cause analysis report is needed.

- 2. You used 605°F for the time-at-temperature calculations for the old RPV head. This value is apparently an average value of hot leg temperatures. Use of this temperature, given that you have hot leg resistance temperature detectors (RTDs) with higher temperature values, does not appear to result in a conservative effective degradation year (EDY) calculation.
 - A. Inform the staff as to which temperature value you will use in determining the EDY of your new RPV head, i.e., the average of hot leg temperatures or the highest hot leg temperature. If you do not plan to use the highest hot leg temperature, then respond to items B and C below.
 - B. Provide an explanation for the differences in temperature readings for the RTDs used in determining the average value used in the EDY calculation.
 - C. Provide a technical basis for not using the highest hot leg temperature measurement as input to the EDY calculation.